

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

INSIGNIA SYSTEMS, INC.,

Plaintiff,

v.

NEWS CORPORATION, NEWS
AMERICA MARKETING FSI L.L.C., AND
NEWS AMERICA MARKETING IN-
STORE SERVICES L.L.C.,

Defendants.

Case No. 19-cv-1820 (MJD/BRT)

**DECLARATION OF TODD WIND
IN SUPPORT OF DEFENDANTS'
MOTION FOR JUDGMENT ON
THE PLEADINGS**

I, Todd Wind, declare and state as follows:

1. I am a lawyer with Fredrikson & Byron, P.A., and I make this declaration in support of Defendants' Motion for Judgment on the Pleadings.

2. Attached hereto as Exhibit A is a true and correct copy of the Settlement Agreement & Release dated February 9, 2011. The Settlement Agreement is, by its terms, subject to confidentiality obligations. This Document is Filed Under Seal.

3. By email dated October 11, 2019, the Court provided a draft Protective Order that will be issued on or about November 1, 2019 absent further issues raised by the parties. Defendants have no further issues with the proposed Protective Order. We have discussed this issue with Plaintiff's counsel and they have advised that they will report back shortly as to whether there are any additional concerns regarding the proposed Protective Order.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: October 21, 2019

s/ Todd Wind

Todd Wind